

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In the Matter of

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Revision of the Commission's Rules
To Ensure Compatibility with
Enhanced 911 Emergency
Calling Systems

Targeted Comments on
Wireless E-911 Phase II Automatic
Location Identification Requirements

CC Docket No. 94-102
RM-8143

DA 99-1049

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF AT&T WIRELESS SERVICES, INC.

AT&T Wireless Services, Inc. ("AT&T"), by its attorneys, respectfully submits these comments in response to the Wireless Telecommunications Bureau's June 1, 1999 Notice requesting targeted comment on three issues related to the Commission's Phase II automatic location information ("ALI") requirements.^{1/} AT&T is firmly committed to meeting the Commission's Phase II ALI requirements, but has not yet determined what technology it will use to comply.^{2/} As it did in its comments earlier this year on Phase II issues, AT&T respectfully urges the Bureau not to take any action that will preclude AT&T and other carriers from adopting the best possible Phase II ALI solution.

^{1/} "Wireless Telecommunications Bureau Requests Targeted Comment on Wireless E911 Phase II Automatic Location Identification Requirements," Public Notice, DA 99-1049, rel. June 1, 1999 ("Notice").

^{2/} AT&T Wireless Services, Inc. Comments, CC Docket No. 94-102, DA 98-2631; filed February 4, 1999 ("AT&T Comments").

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I. Standards for Handset-Based Solutions

The Bureau has asked whether it should adopt standards for handset-based approaches similar to those suggested by SnapTrack and APCO.^{3/} As AT&T noted previously, any standards the Bureau adopts should not preclude carriers from using either a handset-based or network-based solution or place carriers at a competitive disadvantage if they choose one or the other or both.

As a general matter, AT&T neither supports nor opposes the standards proposed by SnapTrack and APCO. On one specific point, however, AT&T does object to APCO's proposal. APCO asks the Commission to condition waivers on a wireless carrier's agreement to meet certain deadlines for deploying ALI capable handsets to its subscribers, including a commitment that 99 percent of all phones in use on the carrier's system as of December 31, 2005 will be ALI capable.^{4/} AT&T does not believe that any carrier can commit to having 99 percent of the handsets in use on its system ALI capable by any specific date. No matter how aggressively a carrier implements its replacement program or how generous a subsidy a carrier offers its customers to trade in their old handsets, there will always be a certain number of wireless customers that choose to retain their old handsets. Because wireless carriers ultimately have no control over whether the phones in use on its system are ALI capable, no wireless carrier should ever be held to a 99 or 100 percent utilization standard as a condition of obtaining a waiver of Phase II requirements.

^{3/} Notice at 2 (citing SnapTrack Comments filed February 25, 1999 and APCO Further Comments filed May 25, 1999).

^{4/} APCO Further Comments at 3. While the APCO Further Comments propose a 99 percent utilization rate by 2005, the Notice states that APCO proposes a 100 percent utilization rate by 2005. Regardless, neither a 99 percent nor a 100 percent standard is feasible.

II. Roaming Problems and Handset Turnover

The Bureau has also asked for comment on how to handle the issues of roaming and handset turnover, including Sprint Spectrum's proposal to use a handset-based system for new customers along with an interim network solution for users of handsets that are not ALI capable.^{5/} While AT&T does not have enough information to comment on the technical feasibility of the Sprint Spectrum approach, this is exactly the type of creative solution the Bureau should be encouraging. As AT&T noted in its previous comments, "the best solution may turn out to be a combination of the two technologies."^{6/} The Bureau should not take any action that will preclude or discourage AT&T or any other carrier from adopting the best and most cost effective Phase II ALI solution.

III. Methodologies for Determining ALI Accuracy

Finally, the Bureau asks whether it should clarify or modify its methodology for determining ALI accuracy under Phase II.^{7/} The Bureau notes that the Wireless E9-1-1 Implementation Ad-Hoc ("WEIAD") has sought clarification of the Commission's accuracy requirements.^{8/} AT&T supports the WEIAD filing, which asks the Commission to clarify that Phase II location will be attempted on all 911 calls routed toward a Public Safety Answering Point ("PSAP") and will be accurate to within 125 meters in 67 percent of these calls.

^{5/} Notice at 56 (citing Sprint Spectrum Waiver Request at 5, Sprint Spectrum Reply Comments at 2).

^{6/} AT&T Comments at 6.

^{7/} Notice at 6.

^{8/} Id. (citing November 25, 1998 letter to Magalie Roman Salas from James R. Hobson, National Emergency Number Association, on behalf of WEIAD).

CONCLUSION

AT&T strongly supports the Commission's Phase II ALI requirements and is working hard to ensure that it meets the Phase II deadline. To provide consumers with the most reliable and cost effective solution, the Bureau should adopt standards that allow carriers to consider the widest possible range of technological solutions, including a handset-based solution.

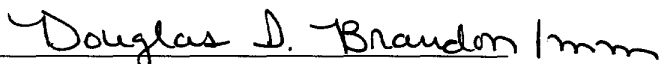
Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Michelle Mundt, hereby certify that on this 17th day of June 1999, I caused copies of the foregoing "Comments of AT&T Wireless Services, Inc." to be sent to the following by either first class mail, postage prepaid, or by hand delivery (*):

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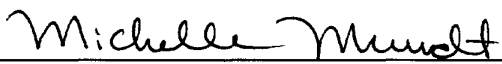
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